

## UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States District Court  
Southern District of Texas  
FILED

MAY 15 2018

United States of America

v.

KENNETH S. JONES

YOB 1980

U.S.C.

Case No.

M-18-0967-M

David J. Bradley, Clerk

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 17, 2018 in the county of Hidalgo in the  
Southern District of Texas, the defendant(s) violated:

## Code Section

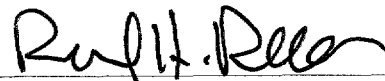
18 U.S.C. 2113 (a) &amp; (d)

## Offense Description

Robbery of an FDIC insured bank by force and violence, or by intimidation, takes or attempts to take, from the person or presence of another, or obtains or attempts to obtain by extortion any property or money or any other thing of value of a bank and in doing so assaults any person, or puts in jeopardy the life of any person by the use of a dangerous weapon or device.

This criminal complaint is based on these facts:

See Attached Statement of Facts

☒ Continued on the attached sheet.

Complainant's signature

Richard H. Bilson, SA FBI - McAllen, TX

Printed name and title

Sworn to before me and signed in my presence.

Date:

May 15, 2018 7:55 am

City and state:

McAllen, Texas

Judge's signature

Peter E. Ormsby, U.S. Magistrate Judge

Printed name and title

On April 17, 2018, officers from the McAllen Police Department responded to a robbery at the Greater State Bank located at 3300 N. 10<sup>th</sup> Street, McAllen, Texas, an FDIC insured financial institution. Upon arrival, officers made contact with multiple employees of the bank who witnessed the robbery which occurred at approximately 10:16AM. The witnesses stated that an individual, later identified as Kenneth S. JONES, described as a masked black male wearing a bright orange hooded sweatshirt, ripped blue jeans, and who walked with a noticeable limp entered the bank brandishing a black handgun of unknown make and model. Witnesses stated as the suspect entered the bank he announced, "This is a robbery! This is not a joke. Put the money on the counter. If you don't do it, I'm going to shoot you!" The suspect then retrieved US Currency from multiple tellers placed it in a white plastic shopping bag, and fled the bank in a stolen vehicle. Employees of Greater State Bank were interviewed and expressed acute fear for their lives as well as concern for their bodily safety as a result of the suspect brandishing a handgun and demanding money from the employees. The employees stated that they believed that if they did not comply that the suspect would shoot them. Despite these threats, employees of the bank were able to insert several marked bills into the currency stolen.

After the suspect fled from the bank, investigators canvassed the area and found the getaway vehicle abandoned some blocks away. Once the vehicle was located, investigators reviewed surveillance cameras in the area, which showed the suspect entering a taxicab. Investigators contacted the cab company and obtained the location of the suspect at a hotel in South McAllen. Employees of the hotel were able to identify the suspect as Kenneth S. JONES. Hotel employees provided JONES's hotel room number and hotel surveillance established that no one other than JONES had entered or exited the room since the robbery.

Believing JONES to be armed and dangerous McAllen Police surrounded the hotel and waited for JONES to exit his hotel room. Officers arrested JONES as soon as he exited. A search incident to arrest provided two marked bills from the Greater State Bank. Investigators obtained a search warrant for the hotel room and discovered the clothes worn by JONES during the robbery, U.S. currency exceeding \$10,000, and several more marked bills.